

July 5, 2012

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> St SW Washington, DC 20554

Re: WT Docket No. 12-4

Dear Ms. Dortch:

On July 2, 2012, I spoke with Louis Paeretz, Wireless Advisor to Commissioner Mignon Clyburn, with regard to the above captioned matter.

I reiterated the arguments made with regard to the ability of Verizon Wireless to interfere with WiFi backhaul and WiFi roaming agreements between the cable MSOs and Veirzon Wireless competitors. I noted that the ongoing relationship between Verizon and its MSO partners substantially changes their incentive to contract with rivals.

I observed that the Commission, when it required the parties to place the agreements in the record, explicitly recognized that those portions of the agreement relating to competition in the wireless market – including the availability of WiFi roaming, WiFi offload, and special access services – were proper matters for consideration in license transfers.

In accordance with Section 1.1206(b), this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

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Respectfully submitted,

/s Harold Feld Senior Vice President Public Knowledge 1818 N St NW, Suite 410 Washington, DC 20036